



JOHN T. CRAM
PRESIDENT

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August 6, 1993

QA 18001

FHWA Docket # MC-93-12
Room 4232, HCC-10
Office of the Chief Counsel
Federal Highway Administration
400 Seventh Street, S.W.
Washington, DC 20590

FHWA-97-2199-38

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To Office of the Chief Counsel:

I am responding to the request for comments regarding FHWA Docket # MC-93-12 "Training for all entry level drivers of commercial motor vehicles".

MTA Schools, over the years and systemwide, have graduated many thousands of entry level drivers for the trucking industry. At the present time, we consist of three training campuses, with our headquarters in Elizabethtown, PA. Our campus in Pennsylvania alone has over 16,000 graduates. We were originally founded in 1968 and have a great deal of experience in training entry level drivers. MTA Schools provide individuals with the knowledge, theories, and practical training necessary to become quality professionals in the trucking industry. Please note that I have underlined "to become quality professionals in the trucking industry".

It is our opinion that the Commercial Vehicle Safety Act of 1986 (CMVSA) requiring a "licensing standard" has improved highway safety and that a mandated "training standard" is not necessary at this time. It is our opinion that a truck driver training school's primary function is to prepare students to successfully pass the CDL General Knowledge and Skills tests and as a result the graduates obtain their Commercial Drivers Licenses. Driving schools cannot teach experience regardless of the duration of the program. Once an individual has obtained a CDL, he or she can be hired by an employer for "on the job training" and "hands-on experience" which leads to becoming a professional truck driver, and in fact, motor carriers do have driver trainers to work with truck school graduates. Therefore, the adequacy of training at any school can be defined by successful outcomes relative to graduates passing the CDL exam. For instance, MTA Schools' 144 hour program has graduated 1,908 people in the past year and a half. One hundred percent of the graduates have passed the CDL General Knowledge test, 99% have passed the CDL Skills test and 94.5% have become employed in the trucking industry. I believe our statistics are superior to many schools that have longer curriculums.

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Determining a "licensing standard" has been successfully accomplished. Establishing an appropriate "training standard" is arbitrary and much more difficult to accomplish. Schools need to have a tightly focused and rigorous curriculum that enables graduates to obtain a CDL. Additional training and experience must continue to come from the trucking companies themselves. Inappropriate "training standards" might burden the Truck School Industry with additional costs, costs that would eventually force tuition expenses to rise, making truck schools unaffordable to many people who would make qualified candidates for the trucking industry. Schools are not employers in the trucking industry and should not be federally mandated to provide assigned standards.

Thank you very much for your consideration of these comments and if there is anything or any questions that MTA Schools or I can help you with in the future, please do not hesitate to contact me.

Sincerely,



John T. Cram
President

JTC/ksv